

Minutes for Rule 21 Working Group Meeting #66
May 4, 2005
San Diego Gas & Electric
San Diego, CA

There were 28 Working Group members in attendance in person or conferenced in by telephone. The next regular meeting of the Working Group is scheduled for June 2 and 3, at CEC Headquarters in Sacramento. The first day will be a DG Reporting Requirement Workshop and the second day will be a regular Rule 21 WG meeting.

Scott Tomashefsky, Chair

Aldridge	Pat	SCE	McAuley	Art	PG&E
Blair	Tom	City of San Diego	Panora	Bob	Tecogen
Blumer	Werner	CPUC/ED	Parks	Ken	SDG&E
Brown	David	SMUD	Prabhu	Edan	Reflective Energies
Cook	Bill	SDG&E	Reilly	P. S.	Ctr for Smart Ergy
Couts	George	SCE	Robinson	Mark	Nextek
Dixon	John	SDG&E	Sheriff	Nora	CAC/EPUC
Edds	Michael	DG Ergy Solutions	Simpson	Joe	Joe Simpson
Goh	Jeff	PG&E	Solt	Chuck	Lindh & Assoc
Iammarino	Mike	SDG&E	Sorter	Chuck	BluePoint Energy
Jackson	Jerry	PG&E	Torribio	Gerome	SCE
Keithly	Bob	SDG&E	Tunnicliff	Dan	SCE
Lacy	Scott	SCE	Whitaker	Chuck	BEW Engineering
Mazur	Mike	3 Phases Ergy Srv			

Combined Process and Technical Group

Utility DG Activity Reports

Meeting materials included SDG&E report thru the end of March.

Rule 21 Revisions Advice Letter Progress and Status

PG&E expects to file its version of the tariff update before the next meeting.

Rule 21 Application Forms

SCE expects to file an advice letter within the next week, while PG&E will file by the next meeting.

CRS Quarterly Data Reports (Per CPUC Resolution E-3831)

It has been determined that the requirement can not be changed by an Executive Order and will require a petition filed by the utilities.

IEEE 1547 Interconnection Standard Activity

The IEEE 1547 Committee has completed the Testing Standard, 1547.1. The balloting issues have been resolved, and the rule is to go to the Board for adoption at the June meeting.

The next IEEE meeting covering the remaining IEEE 1547 daughter documents (IEEE 1547.2, through 1547.6) is in August.

FERC DG Rulemaking

FERC was to consider [RM02-12-000](#) on the same day as the Rule 21 meeting, but it was removed from the agenda. It appears that it will be resolved in the next few weeks.

Rule 21 Certifications

Documentation on the Capstone recertification is in final review and it appears there are no problems.

Bob Panora of Tecogen announced that they are introducing new engine driven generation units with rectifier/inverters to allow variable speed operation for better part-load efficiency. He requested that Tecogen be permitted to certify the inverter and control/monitoring system, but without the engine/generator. This issue was addressed and resolved in the Technical Group. Tecogen may certify the inverter without certifying the engine/generator.

DG that provide only direct-current power

Nextek made a statement indicating that they feel Rule 21 was developed without knowledge or consideration of a DC generation system. They feel their product is a new DG innovation and Rule 21 should be modified to recognize their unique features.

PG&E issued a formal position in which they insist that these systems are covered by Rule 21 and must file an application for interconnection under the Rule. The issue is primarily administration of programs such as SGIP, and exit fees.

Chuck Whitaker disagreed with PG&E's characterization of the Nextek system as operating in parallel with the utility and presented arguments as to why there were no technical reasons to address dc-only generation in Rule 21.

SCE, Whitaker, SMUD and SDG&E all indicated they are opposed to any technical changes to the rule.

Nextek will provide information on existing installations that have received SGIP funding. PG&E will investigate installations in their service territory. SCE will look at applicability of SGIP and other incentive programs with regard to Nextek.

Single DG with multiple utility meters

This subject was held for future consideration after current legislation is resolved. J. Jackson will prepare a list of pending legislation.

FOCUS Interconnection Monitoring Study:

This subject was held for future consideration after pending legislation is enacted or tabled. J. Jackson will prepare a list of pending legislation.

FOCUS Interconnection Monitoring Study:

Joe Simpson presented the proposed new site selection guidelines and the current status of the program. There are currently 13 DGs and 20 monitors. Information and access to the monitoring information in real time is available at the web site www.DGmonitors.com. The program is being expanded and they are currently looking for new sites. The revised site selection guide is available for review and comment on the web site. Mike Edds asked whether the data was able to determine the source of any event. Joe will discuss the issue with Mike.

Process Breakout Group Notes**Action Item C 147**

The WG is currently investigating the extent of various DG reports provided by the utilities to the CPUC, the Energy Commission, and the Air Resources Board. The Working Group has developed a matrix to assist with this effort. There was an item-by-item review of the matrix, and Werner Blumer kept track of the changes. The revised matrix will be posted on the Rule 21 site and will be the subject of discussion at the DG Reporting Requirements Workshop at the CEC on June 2.

Action Item C 142

Under R.04-03-017, the CPUC intends to review the need for having the utilities track costs associated with Rule 21. Art McAuley presented a PowerPoint presentation on the system used by PG&E to track these costs. The group discussed the possibility of using this system as a model for all utility Rule 21 cost tracking.

Action Item P 131

When the utilities contract for continuous export (e.g. RPS Procurements), an interconnection agreement is required. This type of export is not presently addressed in the Rule 21. SDG&E has executed some interconnection agreements on a case-by-case basis. The model SDG&E agreement was discussed by the group. There was some agreement that a standard agreement would be useful and should be developed under Rule 21, but some members felt the name was misleading since systems would not necessarily export all the time. The name "Export Interconnection agreement" was suggested, but there was no concurrence. The WG plans to review the model agreement section-by-section in the next meeting. This will be chaired by Mike Iammarino and Jerry Jackson.

Action Item P 109

The utilities discussed their requirements and lead times for bill inserts. SCE indicated that certain months have high priority items that would probably preclude including DG items. For example, May or July would probably be possible, but not June. Their lead time is 6 weeks for internal lead time, but only 3 weeks for stand alone items. PG&E inserts 5 items per bill. Their timing is probably similar to SCE. The DG insert will probably be a stand-alone insert, rather than an article in a utility news insert. The decision that requires these inserts only calls for a one shot distribution, but the group discussed the possibility of follow-on inserts. Remaining questions include size

requirements, cost and who pays for it, and who prints it. The insert must identify where it is coming from.

Action Item C 105 – DG application list by IOU

Preliminary Discussions: Developing Permanent Interconnection Cost Tracking System What is value? Policy and regulation development.

Technical Breakout Group Notes

Tecogen Inverter Certification Issue Group agreed in principal that the Tecogen inverter/controller “gold” box can be certified independent of the generator, subject as always to review and approval of test results. Suggested following the new Rule 21 requirements and those in 1547 and 1547.1.

T134 Networks –Dave Brown agreed to distribute by May 20 a revised description of Existing Utility Network. Reviewed again the proposed report format (no comments). Was asked to redistribute the latest Workplan and champions list

T113 Redundancy - Reviewed Mfg Input from Bob Panora and Chuck Sorter; Utility Input from Tom Duffy.. Is there a unified situation where redundant relay’s will be required? Dave Brown suggested 5MW or greater: yes, 60kW or less: no. Jeff Goh offered to bring Steven Ng to Sacto to help resolve this issue

T131 Transfer Trip – Reviewed Bill Cook’s write-up. Bill notes that transfer trip may act as a backup method meeting the single point of failure concerns.

Certification Discuss process for adopting IEEE 1547.1, DOE/CTC meeting, suggested changes to the NEC

IEEE 1547.1 Implementation Process and Impact on Rule 21 Sections I and J (ST Comment: We Need a New Action Item Number for this Item. Language should be similar to the language used in Item T101, located on the completed item list